

LINER FREEDMAN TAITELMAN + COOLEY, LLP

ATTORNEYS AT LAW

1801 CENTURY PARK WEST, 5TH FLOOR
LOS ANGELES, CALIFORNIA 90067-6007

TEL: (310) 201-0005

FAX: (310) 201-0045

E-MAIL: bfreedman@lftcllp.com

BRYAN J. FREEDMAN

May 14, 2025

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL**

Dear Judge Liman:

We write in response to the letter filed by Plaintiff/Consolidated Defendant Blake Lively (“Ms. Lively”) and Consolidated Defendant Ryan Reynolds (together, the “Lively Defendants”) regarding their requested intervention in an action in the United States District Court for the District of Columbia seeking to quash the Wayfarer Parties’ subpoena (the “Subpoena”) to Venable LLP (“Venable”) (Dkt. 213).

The Wayfarer Parties anticipate that Venable’s motion to quash will be mooted in short order, as their counsel and Venable are conferring in good faith. However, the Lively Defendants’ insistence that the Subpoena seeks irrelevant information is *wrong*. The Subpoena aims to obtain discovery relating to witness tampering and evidence spoliation. Specifically, the Wayfarer Parties’ counsel are informed and believe, based on information from a source who is highly likely to have reliable information, that (i) Ms. Lively requested that Taylor Swift delete their text messages; (ii) Michael Gottlieb of Willkie Farr, counsel for the Lively Defendants, contacted a Venable attorney who represents Ms. Swift and demanded that Ms. Swift release a statement of support for Ms. Lively, intimating that, if Ms. Swift refused to do so, private text messages of a personal nature in Ms. Lively’s possession would be released. The Wayfarer Parties’ counsel are further informed and believe that a representative of Ms. Swift addressed these inappropriate and apparently extortionate threats in at least one written communication transmitted to Mr. Gottlieb. It is those communications that the Wayfarer Parties seek to obtain by way of subpoena, as they would evidence an attempt to intimidate and coerce a percipient witness in this litigation.

As stated, the Wayfarer Parties’ counsel are in active discussions with Venable to determine how to proceed. Should those discussions prove unfruitful, the Wayfarer Parties will either oppose the

Hon. Lewis J. Liman
May 14, 2025
Page 2

motion to quash or withdraw the current Subpoena in favor of an amended subpoena seeking only the communications in question.

Respectfully submitted,

/s/ Bryan J. Freedman
LINER FREEDMAN TAITELMAN + COOLEY, LLP
Bryan J. Freedman (*pro hac vice*)
Miles M. Cooley (*pro hac vice*)
Theresa M Troupson (*pro hac vice*)
Summer Benson (*pro hac vice*)
Jason Sunshine
1801 Century Park West, 5th Floor
Los Angeles, CA 90067
Tel: (310) 201-0005
Email: bfreedman@lftcllp.com
mcooley@lftcllp.com
ttroupson@lftcllp.com
sbenson@lftcllp.com
jsunshine@lftcllp.com

MEISTER SEELIG & FEIN PLLC
Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
Tel: (212) 655-3500
Email: ms@msf-law.com
kaf@msf-law.com

cc: all counsel of record (via ECF)